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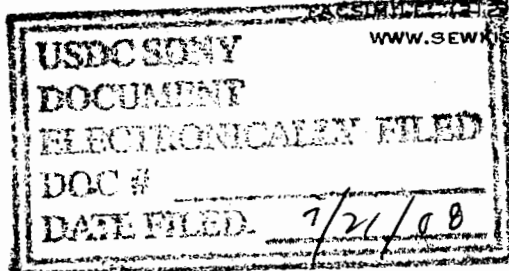
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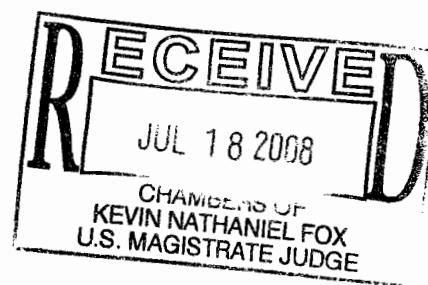
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July 18, 2008

VIA FACSIMILE

Hon. Kevin Nathaniel Fox  
United States District Judge  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street, Room 540  
New York, New York 10007Re: Bibi de Malmanche v. Glenrock, Inc., et al.,  
Civil Action No. 07-10940 (CM)(KNF)

Dear Judge Fox:

We represent Defendants Glenrock Asset Management Associates, L.P., Glenrock, Inc. and Reynard Asset Management, Inc. (collectively, "Defendants") in the above-referenced action.

We write to inform the Court that, after a conference with counsel for Plaintiff Bibi de Malmanche, Defendants have consented to the filing of the proposed Amended Complaint submitted in connection with Plaintiff's July 14, 2008 Motion for Leave to Amend the Complaint. In light of Plaintiff's amended pleading, the parties have agreed that Defendants' Motion for Judgment on the Pleadings dated July 23, 2008 (the "Motion") and Plaintiff's Opposition to the Motion (otherwise due today) should be rendered moot. With regard to Plaintiff's Amended Complaint, counsel for the parties have agreed to the following briefing schedule and hereby jointly request that it be "So Ordered" by the Court:

August 18, 2008:	Defendants will serve a renewed motion to dismiss the Amended Complaint or otherwise respond to the Amended Complaint.
August 29, 2008:	Plaintiff will serve an opposition to Defendants' motion to dismiss the Amended Complaint.
September 5, 2008:	Defendants will serve a reply, if any, to Defendants' renewed motion to dismiss the Amended complaint.

The parties have further conferred regarding the need for additional discovery after Defendants' July 9, 2008 production of documents. At present, the deadline for discovery, including

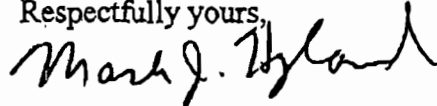
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expert discovery, is August 15, 2008. The parties hereby request an extension of the deadline for discovery to accommodate Plaintiff's review of Defendants' production and to provide the opportunity to propound additional requests for discovery. Specifically, counsel for Plaintiff has indicated that Plaintiff is contemplating a third request for the production of documents and the service of subpoenas for non-party depositions. (Defendants do not object to the timing of Plaintiff's requests for additional discovery but of course reserve all rights in respect of its content.) The parties further request the extension to provide Defendants with the opportunity to timely respond to Plaintiff's expert report after Plaintiff has completed a review of Defendants' document production.

Accordingly, the parties respectfully jointly request that the deadline for discovery, including expert discovery, be extended from August 15, 2008 to October 15, 2008. The Court previously granted an extension of this deadline from July 15, 2008 to August 15, 2008.

Respectfully yours,



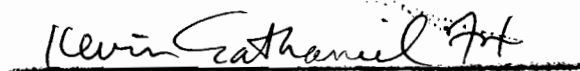
Mark J. Hyland

cc: Jeanette Rodriguez-Morick, Esq. (by e-mail)  
 Douglas E. Grover, Esq. (by e-mail)

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7/21/08  
 Based upon the instant writing, the defendants' motion for judgment on the pleadings, Docket Entry No. 17, is denied, as moot. The plaintiff's motion to amend the complaint, Docket Entry No. 22, is granted, on consent of the defendants. The motion-practice schedule proposed by the parties above, is adopted by the Court, and the time for the parties to complete all pretrial discovery activities, of whatever nature, is enlarged to October 15, 2008.

**SO ORDERED:**

  
 Hon. Kevin Nathaniel Fox  
 United States Magistrate Judge